

ORIGINAL

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - -X
:
UNITED STATES OF AMERICA :
:
- v. - :
:
GERMAN CUADRADO, a/k/a "Geraldo," :
JORGE FLORES, :
PLUTARCO ANGULO-AGUIRRE, a/k/a :
"Matatan," and :
RAFAEL RODRIGUEZ, a/k/a "Dance," :
:
Defendants. :
- - - - -X

SEALED
INDICTMENT

07 Cr.

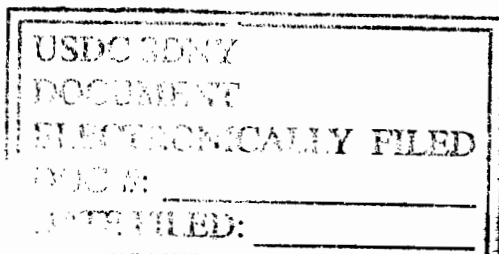
07 CRIM. - 387

COUNT ONE

The Grand Jury charges:

1. On or about September 13, 2006, in the Southern District of New York and elsewhere, GERMAN CUADRADO, a/k/a "Geraldo," JORGE FLORES, PLUTARCO ANGULO-AGUIRRE, a/k/a "Matatan," and RAFAEL RODRIGUEZ, a/k/a "Dance," the defendants, and others known and unknown to the Grand Jury, unlawfully, willfully, and knowingly, did combine, conspire, confederate, and agree together and with each other to violate the laws of the United States.

2. It was a part and an object of the conspiracy that GERMAN CUADRADO, a/k/a "Geraldo," JORGE FLORES, PLUTARCO ANGULO-AGUIRRE, a/k/a "Matatan," and RAFAEL RODRIGUEZ, a/k/a "Dance," the defendants, and others known and unknown, unlawfully, willfully, and knowingly, would and did seize, confine, inveigle,



decoy, kidnap, abduct, and carry away and hold for ransom and reward and otherwise persons, and did transport those persons in interstate commerce, in violation of Title 18, United States Code, Section 1201(a)(1).

Overt Acts

3. In furtherance of the conspiracy and to effect the illegal object thereof, the following overt acts, among others, were committed in the Southern District of New York and elsewhere:

a. On or about September 13, 2006, GERMAN CUADRADO, a/k/a "Geraldo," JORGE FLORES, PLUTARCO ANGULO-AGUIRRE, a/k/a "Matatan," and RAFAEL RODRIGUEZ, a/k/a "Dance," went to the vicinity of a warehouse in Blauvelt, New York.

(Title 18, United States Code, Section 1201(c).)

COUNT TWO

The Grand Jury further charges:

4. On or about September 13, 2006, GERMAN CUADRADO, a/k/a "Geraldo," JORGE FLORES, PLUTARCO ANGULO-AGUIRRE, a/k/a "Matatan," and RAFAEL RODRIGUEZ, a/k/a "Dance," the defendants, unlawfully, willfully, and knowingly, seized, confined, inveigled, decoyed, kidnapped, abducted, and carried away for ransom and reward and otherwise persons, and did transport those persons in interstate commerce, to wit, the defendants forced two individuals into the sleeping compartment of their truck in Blauvelt, New York, and drove them to New Jersey.

(Title 18, United States Code, Section 1201(a(1)) and 2.)

COUNT THREE

The Grand Jury further charges:

5. On or about September 13, 2006, in the Southern District of New York and elsewhere, GERMAN CUADRADO, a/k/a "Geraldo," JORGE FLORES, PLUTARCO ANGULO-AGUIRRE, a/k/a "Matatan," and RAFAEL RODRIGUEZ, a/k/a "Dance," the defendants, together with others known and unknown to the Grand Jury, unlawfully, willfully, and knowingly, conspired to commit robbery, as that term is defined in Title 18, United States Code, Section 1951(b)(1), to wit, armed robbery of two truck drivers, in Blauvelt, New York, of a truckload of perfume, and thereby obstructed, delayed, and affected commerce and the movement of articles and commodities in commerce, as that term is defined in Title 18, United States Code, Section 1951(b)(3).

(Title 18, United States Code, Section 1951(a).)

COUNT FOUR

The Grand Jury further charges:

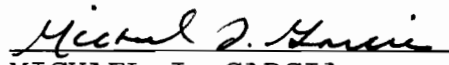
6. On or about September 13, 2006, in the Southern District of New York and elsewhere, GERMAN CUADRADO, a/k/a "Geraldo," JORGE FLORES, PLUTARCO ANGULO-AGUIRRE, a/k/a "Matatan," and RAFAEL RODRIGUEZ, a/k/a "Dance," the defendants, together with others known and unknown to the Grand Jury, unlawfully, willfully, and knowingly, committed robbery, as that term is defined in Title 18, United States Code, Section

1951(b)(1), to wit, armed robbery of two truck drivers, in Blauvelt, New York, of a truckload of perfume, and thereby obstructed, delayed, and affected commerce and the movement of articles and commodities in commerce, as that term is defined in Title 18, United States Code, Section 1951(b)(3).

(Title 18, United States Code, Section 1951(a) and 2.)



FOREPERSON



MICHAEL J. GARCIA
United States Attorney